

Via ECFS

October 15, 2010

Ms. Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, TW-A325
Washington, D.C. 20554

Re: Notice of *Ex Parte* Communication

In the Matter of Standing Rock Telecommunications, Inc. Petition for Designation as an Eligible Telecommunications Carrier; Petition of Standing Rock Telecommunications, Inc. to Redefine Rural Service Areas, WC Docket No. 09-197

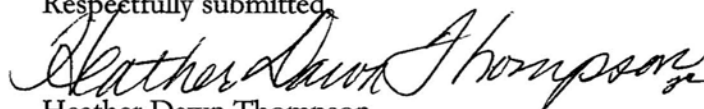
Dear Ms. Dortch:

On October 14, 2010 Heather Dawn Thompson and Douglas G. Bonner, counsel to Standing Rock Telecommunications, Inc. ("SRTI"), met with the following Commission Staff: Irene Flannery and Geoff Blackwell of the Consumer and Government Affairs Bureau, and Vickie Robinson and Divya Shenoy of the Wireline Competition Bureau, Telecommunications Access Policy Division. Geoff Blackwell and SRTI's Miles McAllister participated separately by phone.

During the meeting, SRTI discussed the grounds for its pending Petition for Reconsideration of a portion of the Wireline Competition Bureau's August 24, 2010 Memorandum Opinion and Order in the above-referenced docket. SRTI reiterated the government-to-government relationship between the Standing Rock Sioux Tribe and the Federal government. SRTI respectfully requested that the Commission reconsider its interpretation of the interaction between the controlling statute, 47 U.S.C. §214(e)(6) and the outdated Commission Rule §54.207(d)(1), and to hold consistent with its own precedent in *Western Wireless*, 16 FCC Rcd 18133 (2001) that the Commission alone has the authority to make ETC designations and redefine study areas on Tribal lands, particularly when the common carrier is a Tribally-owned wireless carrier whose service area is wholly contained within the exterior boundaries of an Indian reservation.

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,



Heather Dawn Thompson

Counsel to

Standing Rock Telecommunications, Inc.